

ORIGINAL

LODGED

EDWARD H. KUBO, JR. 2499  
United States Attorney  
District of Hawaii  
R. MICHAEL BURKE 1902  
Assistant U.S. Attorney  
Room 6-100, PJKK Federal Bldg.  
300 Ala Moana Boulevard  
Honolulu, HI 96850  
Telephone: 541-2850  
Facsimile: 541-3752  
E-mail: [Mike.Burke@usdoj.gov](mailto:Mike.Burke@usdoj.gov)

SEP 28 2006  
CLERK, U. S. DISTRICT COURT  
DISTRICT OF HAWAII

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

SEP 28 2006  
at 2 o'clock and 58 min M  
SUE BEITIA, CLERK

PHILIP E. BLONDIN  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 683, Ben Franklin Station  
Washington DC 20044-0683  
Telephone: (202) 307-6322  
Facsimile: (202) 307-0054  
E-mail: [Philip.Blondin@USDOJ.gov](mailto:Philip.Blondin@USDOJ.gov)

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARY L. PROTHEROE; MARY L.  
PROTHEROE as trustee of the MARY LEE  
PROTHEROE REVOCABLE  
TRUST; DEPARTMENT OF LABOR AND  
INDUSTRIAL RELATIONS, STATE OF  
HAWAII; DEPARTMENT OF TAXATION,  
STATE OF HAWAII; GREDGUARD  
CORPORATION, and LEAKMASTER, INC,

Defendants.


Civil No. 03-00210-SPK BMK

**STIPULATION FOR DISMISSAL;  
ORDER**

On November 3, 2004, the District Court entered an order approving a stipulation for the entry of judgment against Mary L. Protheroe. Given the fact that Ms. Protheroe has now fully paid the tax liabilities at issue, pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, Plaintiff the United States of America, through its undersigned counsel, and Department of Labor and Industrial Relations; Department of Taxation; Credguard Corporation, and Leakmaster Inc., through their respective, undersigned counsels, hereby stipulate that the above-captioned action be dismissed with prejudice, with the parties to bear their own litigation expenses, including costs and attorney's fees.


DATED this 22 day of September, 2006.

THOMAS E. MOSS  
United States Attorney


  
PHILIPPE E. BLONDIN  
Trial Attorney, Tax Division  
U.S. Department of Justice  
Post Office Box 683  
Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 307-6322

Attorneys for the United States of America

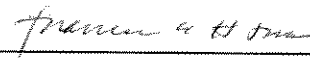
DATED this 27 day of Sept, 2006.

  
\_\_\_\_\_  
JOSEPH KAMAI  
CREDGUARD CORPORATION  
765 Amana Street, Suite 308  
Honolulu, Hawaii 96814-3249


DATED this 28 day of August, 2006.

  
\_\_\_\_\_  
CHARLES S. LOTSOFF  
Attorney for Leakmaster, Inc.  
Century Square  
1188 Bishop St Ste 2711  
Honolulu, Hawaii 96813

DATED this 27<sup>th</sup> day of September, 2006.

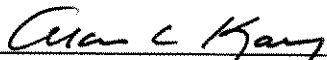
  
\_\_\_\_\_  
FRANCES E. H. LUM  
Department of the Attorney General  
State of Hawaii  
Hale Auhau Bldg., 425 Queen Street  
Honolulu, Hawaii 96813  
Attorney for Dept. of Labor

DATED this 27<sup>th</sup> day of September, 2006.

  
\_\_\_\_\_  
DAMIEN A. ELEFANTE  
Deputy Attorney General  
Dept. Of the Attorney General,  
State of Hawaii  
525 Queen Street, Hale Auhau Building  
Honolulu, Hawaii 96813  
Attorney for Dept of Taxation

IT IS SO ORDERED.

DATED: 9/28/06

  
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE  
*for Judge King*

USA v. Mary L. Protheroe, et al.  
Civil No. 03-00210 SPK BMK  
"Stipulation for Dismissal; Order"